

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

RUBY CARR,)
)
Plaintiff,)
) Civil Action No: 2:07cv532-MHT
vs.)
)
ALABAMA DEPARTMENT)
OF YOUTH SERVICES,)
)
Defendant.

MOTION FOR EXTENSION OF TIME TO ANSWER

AMENDED COMPLAINT

The Alabama Department of Youth Services (DYS), requests an extension of time to answer Plaintiff's Amended Complaint. As grounds for this request, the undersigned submits the following:

1. On November 19, 2007, DYS requested authority to appoint outside counsel.
2. The undersigned attorney of record is now a defendant in this lawsuit. Outside counsel is therefore necessary in the opinion of the undersigned counsel to avoid any appearance of a conflict of interest.
3. The appointment of outside counsel has not yet been made.

WHEREFORE, the undersigned requests an extension of 20 days to respond

to the amended complaint.

Respectfully submitted

s/ T. Dudley Perry, Jr.
T. Dudley Perry, Jr.
Bar Number: 3985-R67T
General Counsel
Alabama Dept of Youth Services
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CERTIFICATE OF SERVICE

I hereby certify that on the 18th of December, 2007, I electronically filed the forgoing **MOTION FOR EXTENSION OF TIME TO ANSWER AMENDED COMPLAINT**, with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Guy D. Chappell III
3100 Independence Drive; Suite 200
Birmingham, AL 35209

s/T. Dudley Perry, Jr.
T. Dudley Perry, Jr.
General Counsel
Alabama Department of Youth
Services